UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Chapter 13

Chris Cinkaj,

Debtor

: NO. 25-10591-amc

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

The Debtor has filed a Motion to Extend Automatic Stay on February 21, 2025. Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the Motion or if you want the Court to consider your views on the Motion, then <u>on or before</u>

March 4, 2025, you or your attorney must do all of the following:

(a.) File an answer explaining your position at:

Clerk, U.S. Bankruptcy Court, Eastern District of Pennsylvania Robert N. C. Nix Sr. Federal Courthouse 900 Market Street Philadelphia, PA 19107

(b.) Mail a copy to the Movant:

Paul A. R. Stewart, Esquire Helm Legal Services LLC 333 E. Lancaster Avenue, Suite 140 Wynnewood, PA 19096

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the relief requested in the motion.
- 3. A hearing on the Motion is scheduled to be held before the Honorable Ashley M. Chan on <u>Tuesday, March 11, 2025 at 11:00 am</u> via telephonic hearing.

Telephone: 1-646-828-7666 Meeting ID: 160 6807 8081

Dated: February 21, 2025 /s/ Paul A. R. Stewart

Paul A. R. Stewart, Esquire Legal Helm LLC 333 E. Lancaster Ave, Suite 140 Wynnewood, PA 19096 610-864-5600 Attorney for Debtor

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CERTIFICATE OF SERVICE

I, Paul A. R. Stewart, Esquire, hereby certify that February 21, 2025, I served via first class regular mail and/or electronic filing, with a true and correct copy of the <u>Debtor's Notice</u> of <u>Motion for Continuation of Automatic Stay</u> upon:

Counsel for Bank

Denise Carlon KML Law Group, P.C. 701 Market Street, Suite 5000 Philadelphia, PA 19106-1532 215-627-1322

United States Trustee

Office of United States Trustee Robert N.C. Nix Federal Building 900 Market Street, Suite 320 Philadelphia, PA 19107 215-597-4411

Kenneth E. West, Trustee

United States Trustee Office of the Chapter 13 Standing Trustee 190 N. Independence Mall West, Suite 701 Philadelphia, PA 19106 215-597-4411

/s/ Paul A.R. Stewart

Paul A.R. Stewart, Esquire Legal Helm LLC 333 E. Lancaster Ave, Suite 140 Wynnewood, PA 19096 610-864-5600 pstewart@legalhelm.com Attorney for Debtor